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May 25, 2006

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VIA FACSIMILE AND U.S. MAIL

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VIA FACSIMILE AND U.S. MAIL

Robert D. Drummond, Jr., Esquire
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Fairhope, Alabama 36532

Re: *A.G., a minor child; D.A., a minor child; A.L., a minor child; M.K., a minor child; and M.H., a minor child, vs. Autauga Co. BOE, Joseph L. Butler and Terry Wright*
United States District Court, Middle District of Alabama
Civil Action No. : 2:05-CV-1090-W
Our File No. : (242) 050055

Dear Gentlemen:

I am receipt of Mike's letter attempting to reach an agreement on taking the deposition of Mr. Wright before June 22, 2006. Please be advised that pursuant to my letter to both of you, dated January 25, 2006, the defendants have already requested the first depositions of the plaintiffs in this matter. We cannot agree to take the deposition of a defendant prior to the plaintiffs' depositions being taken. Therefore, please provide some proposed dates during the month June when the student plaintiffs and both parents, if both have knowledge of the allegations in the Complaint, can be made available for their depositions. As I proposed in my January 25th letter, we can take an entire family's depositions on one day at the Chapter I Building of the Autauga County Board of Education. After these depositions are completed, we can then discuss taking any defendant's deposition. I look forward to hearing from you regarding possible dates for the plaintiffs' depositions.

Sincerely,

Kate Hortberg
Katherine C. Hortberg

KCH/dpt

cc: Terry Wright

